

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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KDH CONSULTING GROUP LLC, directly and  
derivatively on behalf of ITERATIVE CAPITAL, L.P.,

20 Civ. ( )

ECF Case

Plaintiff,

– against –

ITERATIVE CAPITAL MANAGEMENT L.P.,  
ITERATIVE CAPITAL GP, LLC, ITERATIVE OTC,  
LLC (D/B/A “I2 TRADING” AND “ESCHER”),  
ITERATIVE MINING, LLC, BRANDON BUCHANAN  
and CHRISTOPHER DANNEN,

**DECLARATION OF RIKA  
KHURDAYAN IN SUPPORT  
OF PLAINTIFF’S  
APPLICATION FOR  
PRELIMINARY INJUNCTION  
AND TEMPORARY  
RESTRAINING ORDER**

Defendants.

I, Rika Khurdayan, declare under penalty of perjury that the following is true and correct:

1. I am a partner at Dilendorf Khurdayan PLLC, attorneys for the Plaintiff in the above captioned action. I am an attorney duly admitted to practice before this Court.

2. I respectfully submit this declaration in support of the Plaintiff’s Emergency Application for Preliminary Injunction and Temporary Restraining Order and to transmit true and correct copies of the following documents:

Exhibit A: Interview transcript titled “Leo Zhang, Principal at Iterative Capital Management discusses the unseen impact Bitcoin miners have on the overall market,” published by The Block Crypto, dated December 10, 2019, available at <https://www.theblockcrypto.com/post/49789/leo-zhang-principal-at-iterative-capital-management-discusses-the-unseen-impact-bitcoin-miners-have-on-the-overall-market> (last accessed on April 24, 2020).


Exhibit B: Demand for books and records prepared by my office and sent on behalf of Plaintiff to Iterative Capital, L.P. and its administrator on April 14, 2020 (“Demand”).

Exhibit C: Email from Iterative in response to the Demand addressed to me, dated April 14, 2020.

Exhibit D: Letter from Iterative's counsel in response to the Demand addressed to my office, dated.

I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge, information and belief.

Executed on April 27, 2020  
New York, New York

  
Rika Khurdayan